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August 1, 2005

VIA E-FILE and HAND DELIVERY

The Honorable Sue L. Robinson
U.S. District Court for the District of Delaware
844 North King Street - Room 4209
Lock Box 18
Wilmington, DE 19801

**Re: Teleglobe Communications Corporation, et al. v.
BCE, Inc., et al.; Civil Action No. 04-CV-1266**

Dear Chief Judge Robinson:

On July 7, 2005, Your Honor held an in-person discovery conference during which plaintiffs addressed, among other things, the issue of what e data searches remain to be done on BCE's live server data. As we apprised Your Honor at that time, there are approximately 2900 general data folders containing "live server data" that were captured, but not comprehensively searched, by BCE (the "2900 folders"). Despite Debtors' repeated requests to BCE that a comprehensive search of this e data be undertaken, BCE has repeatedly refused to do so. During the July 7 hearing, Your Honor instructed the parties to "meet and confer" on appropriate search terms and/or phrases to be applied to the 2900 folders and, in the absence of a mutually agreed upon list of search terms and/phrases, to submit to the Court our "best shot" on August 1, 2005.

Debtors have attempted to follow the Court's instructions and, to that end, compiled a list of search phrases to be applied to a search of the 2900 folders. This list was forwarded to counsel for the Defendants on July 22, 2005. No response was forthcoming until July 29, 2005 when we received a message from Paula Howell of Shearman and Sterling declining, yet again, to run the search of the 2900 folders. Defendants have yet to propose an alternative list of search terms/phrases or to identify specific concerns with any of the specific search phrases proposed by Debtors on July 22, 2005. Instead, Defendants cited to the alleged unreasonable and burdensome nature of Debtors' request that a comprehensive search of the 2900 folders be undertaken, even with the more narrow list of search phrases proposed by the Debtors. The Defendants maintain this position even though approximately 645 folders have Teleglobe, or some derivation thereof, in the folder title. In addition, approximately 1900 folders reference finance related or Board of Director related materials, both of which are clearly relevant to this case where key issues include the financial position of Teleglobe, BCE's funding commitment to Teleglobe and the actions and resolutions of the Board of Directors for both Teleglobe and BCE.

The Honorable Sue L. Robinson
August 1, 2005
Page 2

Given the apparent subject matter of the e data contained in the 2900 folders, Debtors continue to believe that a comprehensive search of the e data contained in those folders is warranted. Pursuant to the Court's directive at the July 7 conference, Debtors hereby submit for Your Honor's consideration the list of search phrases we propose be used to search the 2900 folders, which is the same list previously provided to counsel for the Defendants on July 22, 2005.

Counsel is prepared to discuss this and other discovery related issues at the in-person discovery conference scheduled for August 10, 2005 at 5:00 p.m. Should Your Honor have any questions or concerns in the interim, counsel is available at the Court's convenience.

Respectfully submitted,



Anne Shea Gaza

ASG:csi

cc: Clerk of the Court (w/enc.) (via e-file and hand delivery)
Pauline K. Morgan, Esq. (w/enc.) (via hand delivery)
Kevin Gross, Esq. (w/enc.) (via hand delivery)
John P. Amato, Esq. (w/enc.) (via facsimile)
George J. Wade, Esq. (w/enc.) (via facsimile)
C. Malcolm Cochran, IV, Esq. (w/enc.)

Teleglobe 2900 Folders Search Phrases

(decid* or decision or agree* or propos* or will or won near5 t or shall) near20 (provid* or give or supply or inject or infuse or provision or stop* or cease or discontinue* or suspend* or terminat* or withdraw*)

(provid* or give or supply or inject or infuse or provision or stop* or cease or discontinue* or suspend* or terminat* or withdraw* or debt) near20 (fund* or financ* or support* or capital or equity or money or cashflow or debt or cash)

(commit or commitment or committed or promis* or plan* or intend or intent* or propos*) near20 (provid* or give or supply or inject or infuse or provision)

(we or Bell or BCE or "Bell Canada") near40 (support or commit or commitment or committed or promis* or plan* or intend or intent* or propos*)

Monty near40 (support* or commit or commitment or committed or promis* or plan* or intend or intent* or propos* or fund or supply or give or infuse or inject)

(Teleglobe or TG or TGO) near40 (support* or commit or commitment or committed or promis* or plan* or intend or intention or provid* or give or supply or inject or infuse or provision or support* or fund*)

(Deloitte or DT or D near3 T) near99 (provid* or fund* or support or provision or give or inject or infuse or supply or financ*)

(Deloitte or DT or D near3 T) near99 (Teleglobe or TG or TGO or globe*)

(provid* or provision or give or inject or infuse or supply) near20 (fund* or financ* or support* or capital or equity or money or "going concern" or good will or goodwill or cash or advance or cashflow or debt)

(analy* or assess or set or establish* or determin* or evaluat* or exam* or review* or report*) near40 (business* or financ* or budget* or cash or advance or debt or cashflow or capital or investment or equity or fund* or "cash flow" or "pro forma" or forecast or projection or projected or "good will" or goodwill or "going concern")

(request* or demand* or analy* or report or provid*) near40 (we or BCE or Bell Canada or Bell) near40 (fund* or financ* or support* or capital or equity or money or loan or provid* or give or supply or inject or infuse or provision)

(analy* or assess or set or establish or determin* or evaluat* or exam* or review* or report*) near40 (we or BCE or Bell or Bell Canada") near40 (invest* or capital* or equity or inject* or infuse* or support or fund* or commit or commitment or committed or debt or cash or advance or cashflow or "cashflow" or goodwill or "good will" or going concern)

(invest* or capital* or equity or inject or infuse or support or fund* or commit or commitment or committed) near40 (funds or finance* or support* or fund* or capital or loan or equity or money or debt or cash or advance or cashflow)

(arrange* or agree* or understand* or deal or contract or assess*) near40 (we or BCE or "Bell Canada" or Bell) near40 (employee or officer or personnel or worker or staff)

(employee or officer or personnel or worker or staff) near40 (second* or transfer* or leave or move or transition or secund*)

(second* or transfer* or leave or move or transition or secund*) near40 (arrange or arrangements or plan or scheme or propos*)

(we or Bell or BCE or Bell Canada) near40 (control* or manag* or operate or dictate or decide or instruct) near40 (affairs or business or operations or Teleglobe or TG or TGO)

.....
(transfer* or replace* or transition or shift or assess or move) near40 (job or function or reporting or position or employ*) near20 (we or BCE or "Bell Canada" or Bell)

"Synergy Project" or "Project X"

(agree* or contract or propos* or offer or transaction or deal) near20 (we or BCE or "Bell Canada" or Bell) near20 (purchas* or sell or sale or transfer*)

(purchas* or sell or sale or transfer*) near20 (product or service or property or fund or asset or interest or share* or debt or equity or obligation)

(we or BCE or "Bell Canada" or Bell) near20 (setoff or offset or "set off" or "off set" or deduct) near20 (debt or owe or owing or due or payable or credit or claim)

(we or BCE or "Bell Canada" or Bell) near99 (brand* or rebrand* or rename or trademark or mark or name or tradename or "trade name")

.....
(solven* or liquidat* or insolven* or restruct*) near99 (Teleglobe or TG or TGO or subsid*)

.....
(pay* or repay* or satis* or cure or meet or fund*) near20 (debt or loan or fund* or money or obligation*)

(commit or commitment or committed or promis* or plan* or intend or intention or propos*) near20 (Teleglobe or TG or TGO)

(provid* or give or supply or inject* or infus* or provision or support* or fund* or stop or cease or discontinue or suspend or terminat* or withdraw) near40 (Teleglobe or TG or TGO)

("good will" or goodwill or writedown or "write down") near99 (Teleglobe or TG or TGO)

("good will" or goodwill or writedown or "write down") near40 (value or valuat* or impair*)

.....
(3d or third or 4th or fourth or 5th or fifth) near20 (preferred or share or shares or series or stock)

analy* near5 (confer* or call* or meet* or statement* or presentation* or report*)

(BCE or factor*) near20 risk

build* near20 (GlobeSystem or "Globe System" or Globe)

(commit or commitment* or committed) near20 (fund or money or equity or loan or letter or formal or informal or finance or written or oral or verbal)

control* near20 (BCE or stock* or share* or interest or person or exert or exercise)

(credit* or bank) near20 (facilit* or rat*)

("Independent Committee") near20 (Teleglobe or TG or TGO or Board)

note* near50 (bank or promissory)

("one time" or one-time) near20 (pick* or transact* or charge or revenue* or loss)

partner* near20 (equity or strategic or invest*)

(redeem* or redemption*) near20 (preferred or share*)

syndicate near20 (lending or bank)